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5 Attorneys for Defendant,
6 *SANTANDER CONSUMER USA, INC.*

7
8 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA
9

10 TIEKA BROWN,

11 Plaintiff,

12 vs.

13 TRANS UNION LLC; EXPERIAN
INFORMATION SOLUTIONS, INC.;
14 NATIONAL CONSUMER TELECOM &
UTILITIES EXCHANGE, INC.; INNOVIS
15 DATA SOLUTIONS, INC.; CLARITY
SERVICES, INC.; CAPITAL ONE FINANCIAL
16 CORPORATION; SYNOVUS BANK DBA
FIRST PROGRESS AND SANTANDER
17 CONSUMER USA INC.,

18 Defendants.
19

Case No.: 2:25-cv-00013-JCM-DJA

JOINT MOTION

**~~STIPULATION~~ TO EXTEND DEFENDANT
SANTANDER CONSUMER USA, INC.'S
TIME TO RESPOND TO PLAINTIFF'S
COMPLAINT**

[FIRST REQUEST]

20 Defendant SANTANDER CONSUMER USA, INC. ("SANTANDER") and Plaintiff TIEKA
21 BROWN stipulate and agree as follows:

22 1. SANTANDER's time to respond to the Complaint (ECF No. 1), filed on January 3, 2025
23 will be continued from February 6, 2025 to February 20, 2025.

24 2. SANTANDER requires additional time to investigate the allegations and respond to the
25 Complaint.

26 ///

27 ///

28 ///

3. This is SANTANDER's first request for an extension.

DATED this 5th day of February, 2025

DATED this 5th day of February, 2025

SPRINGEL & FINK LLP

FREEDOM LAW FIRM, LLC

/s/ Leonard T. Fink

/s/ Gerardo Avalos

By:

By:

LEONARD T. FINK, ESQ.
Nevada Bar No. 6296
9075 W. Diablo Drive, Suite 302
Las Vegas, Nevada 89148

GEORGE HAINES, ESQ.
Nevada Bar No. 9411
GERARDO AVALOS, ESQ.
Nevada Bar No. 15171
8985 South Eastern Ave., Suite 100
Las Vegas, Nevada 89123

Attorney for Defendant,
SANTANDER CONSUMER USA, INC.

Attorney for Plaintiff,
TIEKA BROWN

Under Local Rule 7-1(c), a stipulation that has been signed by fewer than all the parties or their attorneys will be treated - and must be filed - as a joint motion. The Court thus treats this filing as a joint motion and will expect that future filings follow Local Rule 7-1(c). The Court GRANTS the joint motion (ECF No. 15). IT IS SO ORDERED.

DATED: 2/6/2025


UNITED STATES MAGISTRATE JUDGE
U.S.D.C. Case No. 2:25-cv-00013-JCM-DJA

CERTIFICATE OF SERVICE
Tieka Brown v. Trans Union LLC, et al.
U.S.D.C. Case No.: 2:25-cv-00013-JCM-DJA

STATE OF NEVADA)
) ss.
 COUNTY OF CLARK)

I, Ella Wilczynski, declare:

I am a resident of and employed in Clark County, Nevada. I am over the age of eighteen years and not a party to the within action. My business address is 9075 W. Diablo Drive, Suite 302, Las Vegas, Nevada, 89148.

On **February 5, 2025**, I served the document described as ***STIPULATION TO EXTEND DEFENDANT SANTANDER CONSUMER USA, INC.'S TIME TO RESPOND TO PLAINTIFF'S COMPLAINT [FIRST REQUEST]*** on the following parties:

<input checked="" type="checkbox"/>	VIA ELECTRONIC SERVICE: by submitting the foregoing to the United States District Court for the District of Nevada's ECF-filing System for Electronic Service upon the Court's Service List pursuant to Rule 26(a)(1). The copy of the document electronically served bears a notation of the date and time of service. The original document will be maintained with the document(s) served and be made available, upon reasonable notice, for inspection by counsel or the Court.
<input type="checkbox"/>	VIA U.S. MAIL: by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Las Vegas Nevada. I am "readily familiar" with the firm's practice of collection and processing correspondence by mailing. Under that practice, it would be deposited with the U.S. postal service on that same day with postage fully prepaid at Las Vegas, Nevada in the ordinary course of business.
<input type="checkbox"/>	VIA FACSIMILE: by transmitting to a facsimile machine maintained by the person on whom it is served at the facsimile machine telephone number at last given by that person on any document which he/she has filed in the cause and served on the party making the service. The copy of the document served by facsimile transmission bears a notation of the date and place of transmission and the facsimile telephone number to which transmitted. A confirmation of the transmission containing the facsimile telephone numbers to which the document(s) was/were transmitted will be maintained with the document(s) served.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Ella Wilczynski

 An employee of Springel & Fink LLP

From: [Lisa Lawrence](#)
To: [Ella Wilczynski](#)
Subject: FW: Brown, Tiekia v. Santander - stipulation to extend time to respond to the complaint
Date: Wednesday, February 5, 2025 12:46:52 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image011.png](#)
[Brown - Stipulation and Order to Extend Time to Respond\[59\].docx](#)

Hi, Ella. The email from Plaintiff's counsel is below. Thanks!

From: Gerardo Avalos <gavalos@freedomlegalteam.com>
Date: Wednesday, February 5, 2025 at 11:29 AM
To: Lisa Lawrence <llawrence@yumollp.com>
Cc: Paris Tertanni <ptertanni@freedomlegalteam.com>
Subject: RE: Brown, Tiekia v. Santander - stipulation to extend time to respond to the complaint

Hi Lisa,
No proposed changes, you are welcome to file with my signature.

Kind regards,

Gerardo Avalos, Esq.

Consumer Litigation Attorney
Freedom Law Firm
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E-Fax: 702-385-5518
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Thank you.

From: Lisa Lawrence <llawrence@yumollp.com>
Sent: Wednesday, February 5, 2025 8:45 AM
To: Gerardo Avalos <gavalos@freedomlegalteam.com>
Cc: Paris Tertanni <ptertanni@freedomlegalteam.com>
Subject: Re: Brown, Tieka v. Santander - stipulation to extend time to respond to the complaint

Good morning, Gerardo. We've prepared the attached stipulation extending Santander's time to respond to 2/20/2025. Unless you have any proposed changes, we'll get this on file today. Thank you!

Best regards,
Lisa

Lisa M. Lawrence
YU | MOHANDESI LLP
633 West Fifth Street, Suite 2800
Los Angeles, CA 90071
213.377.5504 Direct | 213.377.5501 Fax

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